

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Rishard Collins

Case: 2:23-mj-30444
Assigned To : Unassigned
Assign. Date : 11/3/2023
CMP: USA v COLLINS (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 1, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Troy Williams

Complainant's signature

Troy Williams, Special Agent, ATF

Printed name and title

Elizabeth A. Stafford

Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 3, 2023

City and state: Detroit, MI

AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT

I, Troy Williams, being first duly sworn, hereby depose and state as follows:

AGENT BACKGROUND

1. I am a Special Agent with the ATF and have been since March 2022.

I have had extensive law enforcement training, including at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. I also have a bachelor's degree in criminal justice.

2. Prior to becoming a Special Agent with the ATF, I was employed with the Detroit Police Department (DPD) for approximately five years as a police officer before becoming a sergeant. During my employment with DPD, I was assigned to multiple specialized units including but not limited to the ATF Task Force as a task force officer. As an ATF task force officer, I investigated criminal violations relating to firearms, firearms trafficking, criminal street gangs and narcotics both as a case agent and assisting officer.

3. This affidavit is comprised of information to which I have personal knowledge as well as information provided by other law enforcement officers including a review of their reports. I have not included each and every fact known

to me concerning this investigation; rather I have set forth only the facts necessary to establish probable cause.

4. The information outlined below is for the limited purpose of establishing probable cause that Rishard COLLINS (B/M/ XX/XX/1987) has violated 18 U.S.C. § 922 (g)(1) – possession of a firearm by a convicted felon.

PROBABLE CAUSE

5. On November 1, 2023, Detroit Police Department (DPD) Police Officers Flannel, Perry and Anouti were on patrol in the area of Greenfield Rd. and W Outer Dr. in Detroit, Michigan. At approximately 6:30 pm, officers initiated a traffic stop on a vehicle occupied by two individuals, including COLLINS, for illegal window tint and uninsured motor vehicle.

6. Officer Perry approached the vehicle and observed COLLINS, who was located in the driver's seat. Once at the vehicle, Officer Perry smelled the odor of recently burnt marijuana emanating from the vehicle. In addition, COLLINS advised Officer Perry that the vehicle belonged to him, and that the vehicle was uninsured. Officer Perry ordered COLLINS, out of the vehicle in preparation for an inventory search and tow, in which COLLINS complied. Moments later, the female passenger was ordered out of the vehicle as well. Both occupants, including COLLINS, were placed in front of the scout car pending an inventory search.

7. While outside of the vehicle, Officer Perry recovered keys from COLLINS' pocket and discovered that the key to the vehicle was attached to a suspected house key. Officer Perry continued his investigation, subsequently conducting an inventory search of the vehicle. While Officer Perry conducted the inventory search, Officer Flannel investigated COLLINS through the Law Enforcement Information Network (LEIN). Officer Flannel observed that COLLINS had an outstanding arrest warrant out of Hazel Park. Officer Flannel exited the scout car and advised COLLINS of his arrest warrant. COLLINS then fled on foot westbound across Greenfield. Officer's Perry and Flannel pursued COLLINS on foot and successfully apprehended him in the backyard of 180XX Greenfield Rd. Officer's Perry and Flannel walked COLLINS back to the location of the traffic stop and placed him in the rear of the scout car.

8. Officer Perry continued the inventory search of the vehicle and recovered one loaded black Ruger P97DC semiautomatic .45 caliber pistol, serial number 66331010 from the center counsel. COLLINS was unable to produce a valid concealed pistol license (CPL) and was subsequently arrested for carrying a concealed weapon in a motor vehicle.

9. I reviewed a computerized criminal history (CCH), which shows that on October 26, 2007, COLLINS was convicted in the 3rd Circuit Court of Detroit, Michigan for the felony offense of attempt – felony weapons – carrying concealed

(Case No. 0702083701). In addition, on January 23, 2017, COLLINS was convicted in the 3rd Circuit of Court of Detroit, Michigan for the felony weapons – carrying concealed (Case No. 1600677901). On July 19, 2021, in United States Court for the Eastern District of Michigan, COLLINS pleaded guilty to Count one: conspiracy to distribute and possess with intent to distribute controlled substances and Count Two: use of a communication facility in facilitating the commission of a violation of the controlled substance act. On November 15, 2021, COLLINS was sentenced by Judge Paul D. Borman to imprisonment for 36 months concurrently followed by three years of supervised release (Case No. 19-20393). At the time of this incident, COLLINS was on supervised release.

10. On November 2, 2023, SA Kevin Rambus, an ATF interstate nexus expert, was provided with a description of the recovered Ruger firearm from the arrest of COLLINS on November 1, 2023. SA Rambus advised that, based on his training and experience, the description provided, without physically examining the firearm, the firearm was manufactured outside the State of Michigan, and thus had traveled in and affected interstate or foreign commerce.

CONCLUSION

11. Probable cause exists that Rishard COLLINS, while on supervised release at the time of this offense, and with all of his felony convictions, knew that he had previously been convicted of a crime punishable by more than one year of

imprisonment, and that COLLINS knowingly possessed a Ruger P97DC semiautomatic .45 caliber pistol, serial number 66331010, which travelled in or affected interstate commerce in violation of 18 U.S.C. § 922(g)(1). This violation occurred on or about November 1, 2023, in the city of Detroit, in the County of Wayne, in the Eastern District of Michigan, Southern Division.

Respectfully submitted,

Troy Williams

Troy Williams
ATF Special Agent

Sworn to before me and signed in my presence and/or by reliable electronic means.

Elizabeth A. Stafford

Honorable Elizabeth A. Stafford
United States Magistrate Judge

Dated: November 3, 2023